

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA

v.

ABDIAZIZ SHAFII FARAH,
MOHAMED JAMA ISMAIL,
MAHAD IBRAHIM,
ABDIMAJID MOHAMED NUR,
SAID SHAFII FARAH,
ABDIWAHAB MAALIM AFTIN,
MUKHTAR MOHAMED SHARIFF, and
HAYAT MOHAMED NUR

**DEFENDANT MOHAMED
JAMA ISMAILS EXHIBIT LIST**

Case Number: 22-cr-124 (NEB/TNL)

PRESIDING JUDGE The Honorable Nancy E. Brasel					PLAINTIFF'S ATTORNEY Joseph H. Thompson Matthew S. Ebert Harry M. Jacobs Chelsea A. Walcker	DEFENDANT'S ATTORNEY Andrew S. Birrell Ian S. Birrell Patrick L. Cotter William J. Mauzy William R. Dooling Edward V. Sapone Joseph S. Friedberg Michael Vitaliano Clayton Carlson Andrew S. Garvis Andrew H. Mohring Frederick J. Goetz Michael J. Brandt
TRIAL DATE (S) Apr. 22, 2024					COURT REPORTER Renee Rogge	COURTROOM DEPUTY Kristine Wegner
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS	

	D2-1				Lease	
	D2-2				Articles of Organization	
	D2-3				State of MN Acknowledgement	
	D2-4				State of MN SOS Confirmation	
	D2-5				Secretary of State Certificate of Organization	
	D2-6				Partnership Agreement	
	D2-7				Equipment Rental Agreement - Empire Cuisine Edge Cuisine	

	D2-8			Ryder Truck Rental History
	D2-9			Mahir Logistics Inc Invoices
	D2-10			A&E Logistics Invoices
	D2-11			Empire Fire Inspection Report (Signed)
	D2-12			Emails (Jan 2020) re Plumbing Inspection Report and ADA Compliance
	D2-13			Emails (Feb 2020) re Plumbing Final Inspection
	D2-14			Emails (Apr 2020) re Inspection report (Electrician)
	D2-15			Emails (Apr 2020) re Inspection report (Cont)
	D2-16			Emails (Apr 2020) re Inspection report (Cont - 2)
	D2-17			Emails (May 2020) re Final Inspect (Scheduling ADA Compliance)
	D2-18			Emails (Jun 2020) re MDH Inspect Report (Health Inspection)
	D2-19			Emails re Payroll, IRS Payments; Attached Employee Roster
	D2-20			Emails with Accountant re Payroll Check Stubs; Attached Paystub
	D2-21			Jabir Jeylani Abdihakim Payroll
	D2-22			Selected Empire 1099s
	D2-23			Economy Restaurant Supply Co - Empire Invoices
	D2-24			Selected Site Authorization Forms
	D2-25			CACFP Contact - Empire - TFMI
	D2-26			DRAFT CACFP Contract Empire-Bock
	D2-27			DRAFT FOF CACFP Contract Empire-Bock
	D2-28			SFSP Contract - Empire - Partners
	D2-29			SFSP Contract - Empire - Partners (2)
	D2-30			Box and Contract - Empire and FOF - Oak Leaf Park
	D2-31			CACFP Contract Partners-Empire-Albright
	D2-32			Contract Supplement Partners-Scarver-Highland

	D2-33			Contract Supplement Partners-Empire
	D2-34			Empire Vendor Catering Contract - SFSP
	D2-35			Empire-Nur Consulting Contract
	D2-36			TTA-Nur Consulting Contract
	D2-37			Bushra-Nur Consulting Contract
	D2-38			Bushra-Empire-Nur Consulting Contract
	D2-39			Bushra-Mizal Consulting Contract
	D2-40			eCFR 225 as of 12-1-21
	D2-41			eCFR 226 as of 12-1-21
	D2-42			eCFR 226 excerpt
	D2-43			USDA FNS Guidance for Local and State Agencies on 60-Day Claim Submission and 90-Day Reporting
	D2-44			FRAC Summary of USDAs Nationwide Child Nutrition Waivers in Response to COVID-19
	D2-45			Emails (July 2020) re Waiver Extension
	D2-46			Waiver - Meal Service Time Flexibility
	D2-47			Waiver - Meal Pattern Flexibility
	D2-48			Waiver - Parents Allowed to Pick Up
	D2-49			Waiver - Non-Congregate Meal Service
	D2-50			USDA SFSP Administration Guide 2016
	D2-51			USDA Site Supervisor's Guide 2017
	D2-52			USDA Nutrition Guide 2018
	D2-53			USDA SFSP Site Agency Monitor Guide 2017
	D2-54			USDA SFSP Sponsor Monitor's Guide 2017
	D2-55			Selected Empire USBank Records
	D2-56			VIDEO - From Partners - Training to Empire on How to Input Food Production Records
	D2-57			VIDEO - From Partners - How to Enter Multi-Meal Packs for Reimbursement

	D2-58				VIDEO - From Partners - How to Enter Menus
	D2-59				Required Civil Rights Training Signature Sheet
	D2-60				Partners in Quality Care - CACFP Annual Training Signature Sheet (Staff)
	D2-61				TTA Summer Food Service Basic Training Manual
	D2-62				USDA SFSP Training Checklist for Administrative Staff
	D2-63				SFSP Training Packet
	D2-64				USDA Site Monitor Packet
	D2-65				Partners in Quality Care - At-Risk Afterschool Training Book
	D2-66				Partners in Quality Care - CACFP Training and Samaha Site Form Opening
	D2-67				(Selected) Empire - AfroProduce - InvoicesChecksReceipts
	D2-68				(Selected) Bushra - AfroProduce - InvoicesChecksReceipts
	D2-69				(Selected) Empire - AnzaInternational - DemandLetter Invoices Receipts
	D2-70				Empire - Asahal- StatementOfAccounts Invoices Receipts
	D2-71				Empire - CapitalImportsLLC - Invoices
	D2-72				TTA - SamsClub - Purchase Log
	D2-73				Empire - FreshFoodXpress - Invoices
	D2-74				Empire - GoldStar - Invoices DemandLetter StatementOfAccounts
	D2-75				Empire - LincolnTradingInternational - Invoices
	D2-76				Empire - MinnesotaFoodGrocery - Invoices DemandLetter
	D2-77				Empire - MinnesotaHalal Meat - Invoices
	D2-78				Empire - RestauranDepot (Jetro) - Purchase Log
	D2-79				Empire - OmaarWholesalers - StatementOfAccount Invoices
	D2-80				Empire - Sams Club Purchases Jan 2020 - Jan 2022
	D2-81				EmpireAfrique - Sysco Purchases (Farah Copy)
	D2-82				EmpireAfrique - Sysco Purchases (GJS Copy)

	D2-83			Empire - TortilleriaLaPerla - Quickbooks Transaction Report
	D2-84			Empire - UpperLakes - Invoices Texts BankPaymentDocs
	D2-85			Empire - Workinesh - Invoices
	D2-86			Selected Afrique InvoicesReceipts
	D2-87			CLiCS 2 Applications -- Feeding Our Future, City of Burnsville Cliff Fen Park
	D2-88			Minnesota Dpt of Education - Instructions for Uploading Files to the CLiCS
	D2-89			CLiCS 2 Applications -- Partners in Nutrition, Albright Townhomes
	D2-90			CLiCS 2 Applications -- Partners in Nutrition, Empire Cuisine
	D2-91			CLiCS 2 -- Example Claims Page -- Thompson County Park
	D2-92			Empire Packing Spreadsheet
	D2-93			Empire - Approved Menus with Substitutions
	D2-94			Winfield Albright Brooklyn Park Menu Calendars
	D2-95			Empire-Winfield 3 Day Meal Pack Instructions
	D2-96			Empire-Winfield 4 Day Meal Pack Instructions
	D2-96			Empire-Winfield Grocery Delivery SFSP Menu Oct 2020
	D2-97			Empire-Winfield Townhomes SFSP Menu April 2021
	D2-98			Blank Monthly PIN Claims Checklist SFSP
	D2-99			Monthly PIN Claims Checklist
	D2-100			Blank Monthly PIN Claims Checklist CACFP
	D2-101			Blank Monthly PIN Claims Checklist CACFP v2
	D2-102			FOF Site Files, Pre Operational Site Visits, Other Documents 2020 Heaven Child Care Center
	D2-103			MDE Site Monitoring Form CACFP
	D2-104			FOF Training and Monitoring Manual
	D2-105			Feeding Our Future - Monitoring Visits Manual
	D2-106			FOF - Monitoring Form - Cedar Childcare - FY20 Trimester 3 and Associated Documents

	D2-107			Partners - Empire - Monitoring Form for Multi-Site Sponsors (St Cloud Somali Athletic Club)
	D2-108			Monitoring Form - As-Sunnah 1-21
	D2-109			Monitoring Form - Betel Oromo 5-21
	D2-110			Monitoring Form - Betel Oromo 10-21
	D2-111			Monitoring Form - Cedar Run 9-21
	D2-112			Monitoring Form - Cedar Run 10-21
	D2-113			Monitoring Form - Empire-Scott Park 10-21
	D2-114			Monitoring Form - Four Seasons - 9-21
	D2-115			Monitoring Form - Cooper CourtHeather Court 1-22
	D2-116			Monitoring Form - Heather Court 9-21
	D2-117			Monitoring Form - Heather Court 10-21
	D2-118			Monitoring Form - Intown Childcare 7-20
	D2-119			Monitoring Form - Intown Childcare 8-21
	D2-120			Monitoring Form - Intown Childcare 11-21
	D2-121			Monitoring Form - La Cruz 10-21
	D2-122			Monitoring Form - MCS 2-21
	D2-123			Monitoring Form - Mind Foundry Owatona 5-21
	D2-124			Monitoring Form - Parkview Heights 1-22
	D2-125			Monitoring Form - Parkview Heights 9-21
	D2-126			Monitoring Form - Parkview Heights 10-21
	D2-127			Monitoring Form - Samaha Islamic Center 1-22
	D2-128			Monitoring Form - Samaha Islamic Center 10-21
	D2-129			Monitoring Form - Scott Park - 10-21
	D2-130			Monitoring Form - Shamrock Court Apartments- 10-21
	D2-131			Monitoring Form - St Cloud Somali Athletic Club 11-21

	D2-132				Monitoring Form Success Academy - 12-20
	D2-133				Monitoring Form Tot Park - 6-21
	D2-134				Monitoring Form - Winfield Townhomes - 10-21
	D2-135				Monitoring Form - Woodbridge - 1-22
	D2-136				Monitoring Form - Woodbridge - 9-21
	D2-137				Monitoring Form - Woodbridge - 10-21
	D2-138				MDE-Partners Guidance - Monitor Procedures
	D2-139				Daily Site Delivery Receipt (Intown Child Care)
	D2-140				Daily Site Delivery Receipt (Future Scholars Childcare)
	D2-141				Summer Food Service Program - Site Delivery Receipts
	D2-142				August-Selected Summer MealCounts and Delivery Receipts
	D2-143				62-cv-23-863 - Bock's Answer, Counterclaims, and Jury Demand
	D2-144				Emails between Abdiaziz Farah and Kara Lomen (Extracted)
	D2-145				Emails between Abdiaziz Farah and Mahad Ibrahim-atMindFoundry (Extracted)
	D2-146				Chats between Abdiaziz Farah and Julius Scarver (Extracted)
	D2-147				Emails between Abdiaziz Farah and Julius Scarver (Extracted)
	D2-148				Chats between Abdiaziz Farah and Hadith Ahmed (Extracted)
	D2-149				Emails between Abdiaziz Farah and Hadith Ahmed (Extracted)
	D2-150				Emails between Abdiaziz Farah and Adeline Grier-Welch (Extracted)
	D2-152				Emails between Abdiaziz Farah and Bianca Scott (Extracted)
	D2-153				Connections - News from the Association of Metropolitan School Districts - Aug 2021
	D2-154				Facebook - St. Paul Public Schools - Sep. 4 2020
	D2-155				Facebook - St. Paul Public Schools - Oct. 10 2020
	D2-156				Facebook - St. Paul Public Schools - Aug. 31 2021
	D2-157				22-cv-02195-JRT-JFD - Exhibit J - 9-8-22

	D2-158			Emails between Abdiaziz Farah and Edgar H (Extracted)
	D2-159			US Postal Inspection Service - Memorandum of Interview - Chantelle Cavender
	D2-160			Email (Dec 2020) from Christine Otte to Kara Lomen and Abdiaziz Farah Re food distribution at Winfield
	D2-161			Letter from Christine Otte - Feb 5 2021
	D2-162			Email (Apr 2020) from Abdiaziz Farah to Kara Lomen and Adeline Grier-Welch re Empire Menu-DRAFT
	D2-163			Email (Apr 2020) from Adeline Grier-Welch to Abdiaziz Farah and Others
	D2-164			Emails (Jun 2020) between Kara Lomen and Mahad Ibrahim
	D2-165			Emails (Jul 2020) between Abdiaziz Farah, Kara Lomen, Mahad Ibrahim, Adeline Grier-Welch
	D2-166			Emails (Jul 2020) between Adeline Grier-Welch, Robyn Tousignant, Kara Lomen, Jodie Luzum
	D2-167			Emails (Jul 2020) between Mahad Ibrahim, Kara Lomen, and Abdiaziz Farah
	D2-168			Emails (Aug 2020) between Kara Lomen and Abdiaziz Farah
	D2-169			Emails (Aug 2020) between Kara Lomen, Mahad Ibrahim, and Abdiaziz Farah
	D2-170			Emails (Sep 2020) between Kara Lomen and Abdiaziz Farah
	D2-171			Emails (Sep 2020) between Emily Honer, Maged Hanafi, Michael Meltzer
	D2-172			Emails (Oct 2020) between Kara Lomen, FNS Administrator, Jodie Luzum
	D2-173			Emails (Dec 2020) between Abdiaziz Farah, Kara Lomen, Adeline Grier-Welch, Julius Scarver,
	D2-174			Emails (Jan 2021) between Abdiaziz Farah and Kara Lomen
	D2-175			Emails (Jan 2021) between Abdiaziz Farah, Fatima Mohamud, and Mahad Ibrahim
	D2-176			Emails (Jan 2021) between Cindy Anderson, Kara Lomen, Dan Smeriglio, and Jodie Luzum
	D2-177			Emails (Jan 2021) between Adeline Grier-Welch, Kara Lomen, Mahad Ibrahim, Abdiaziz Farah, Jodie Luzum, and Julius Scarver
	D2-178			Emails (Feb 2021) between Mahad Ibrahim, Anthony Cordoba, Derek Czapiewski, Abdiaziz Farah
	D2-179			Emails (Feb 2021) between Mahad Ibrahim, Anthony Cordoba, Derek Czapiewski, Abdiaziz Farah
	D2-180			Emails (Feb 2021) between Mahad Ibrahim, Anthony Cordoba, Derek Czapiewski, Abdiaziz Farah
	D2-181			Emails (Feb 2021) between Mahad Ibrahim, Anthony Cordoba, Derek Czapiewski, Abdiaziz Farah
	D2-182			Emails (Feb 2021) between Mahad Ibrahim, Anthony Cordoba, Derek Czapiewski, Abdiaziz Farah

	D2-183			Emails (Feb 2021) between Mahad Ibrahim, Anthony Cordoba
	D2-184			Emails (Apr 2021) between Abdiaziz Farah, Hadith Ahmed, Abdi Nur, CACFP Claims
	D2-185			Emails (Apr 2021) between Abdiaziz Farah, Mahad Ibrahim, Julius Scarver, Kara Lomen
	D2-186			Emails (June 2021) between Abdiaziz Farah, Mahad Ibrahim, Kara Lomen, Jessica Cocoran
	D2-187			Emails (June 2021) between Abdiaziz Farah, Mahad Ibrahim, Kara Lomen, Jodie Luzum, Bianca Scott
	D2-188			Emails (June 2021) between Bianca Scott, Abdi Nur, Mahad Ibrahim
	D2-189			Emails (July 2021) between Kara Lomen, Abdiaziz Farah, Mahad Ibrahim
	D2-190			Emails (July 2021) between Mahad Ibrahim, Bianca Scott, Fatima Mohamud
	D2-191			Emails (July 2021) between Jodie Luzum, Kara Lomen, Bianca Scott
	D2-192			Emails (July 2021) between Abdiaziz Farah, Mahad Ibrahim, Mukhtar Sharif, Bianca Scott
	D2-193			Emails (July 2021) between Abdiaziz Farah, Mahad Ibrahim, Kara Lomen, Bianca Scott
	D2-194			Emails (July 2021) between Sade Hashi, Jodie Luzum
	D2-195			Emails (July 2021) between Mahad Ibrahim, Mukhtar Sharif, Abdiaziz Farah, Second Harvest
	D2-196			Emails (Aug 2021) between Abdiaziz Farah, Abdi Nur, Abdirahman Mukhtar
	D2-197			Emails (Jun 2021) between Mahad Ibrahim, Anthony Cordoba, Derek Czapiewski, Mukhtar Shariff, Abdiaziz Farah
	D2-198			Emails (Sep 2021) between Jessica Corcoran, Kara Lomen, Jodie Luzum, Bianca Scott, Mukhtar Shariff, Abdiaziz Farah
	D2-199			Emails (Sep 2021) between Jessica Corcoran, Kara Lomen, Jodie Luzum, Bianca Scott, Mukhtar Shariff, Abdiaziz Farah
	D2-200			Emails (Sep 2021) between Jessica Corcoran, Kara Lomen, Jodie Luzum, Bianca Scott, Mukhtar Shariff, Abdiaziz Farah
	D2-201			Emails (Sep 2021) between Kara Lomen, Bianca Scott, Mahad Ibrahim, Abdiaziz Farah, Marwa Issa, Xavier Munoz
	D2-202			Emails (Sep 2021) between Abdiaziz Farah, Abdi Nur, Kara Lomen
	D2-203			Emails (Sep 2021) between Kara Lomen, Abdiaziz Farah, Mahad Ibrahim, Bianca Scott, Abdi Nur, Hayat Nur
	D2-204			Emails (Sep 2021) between Abdiaziz Farah, Robyn Tousignant, Kara Lomen, Mahad Ibrahim, Bianca Scott
	D2-205			Emails (Oct 2021) between Xavier Munoz, Abdiaziz Farah, Bianca Scott, Mahad Ibrahim
	D2-206			Emails (Oct 2021) between Abdiaziz Farah, Bianca Scott, Mahad Ibrahim
	D2-207			Emails (Oct 2021) between Edgar Huichapa, Abdiaziz Farah, Mahad Ibrahim, and Bianca Scott

	D2-208			Emails (Oct 2021) between Philipo Dyauli, Julius Scarver, Abdiaziz Farah
	D2-209			Emails (Nov 2021) between Abdiaziz Farah, Philipo Dyauli, Julius Scarver, Kara Lomen
	D2-210			Emails (Nov 2021) between Abdiaziz Farah, Philipo Dyauli, Julius Scarver
	D2-211			Emails (Nov 2021) between Abdiaziz Farah, Philipo Dyauli, Julius Scarver
	D2-212			Emails (Nov 2021) between Abdiaziz Farah, Philipo Dyauli, Julius Scarver, Edgar Huichapa, Madina Ali
	D2-213			Emails (Nov 2021) between Abdiaziz Farah, Julius Scarver
	D2-214			Emails (Nov 2021) between Abdiaziz Farah, Julius Scarver
	D2-215			Emails (Nov 2021) between Abdiaziz Farah, Fatima Mohamud, Abdi Nur, Kara Lomen, Bianca Scott, Mahad Ibrahim
	D2-216			Emails (Dec 2021) between Abdiaziz Farah, Kara Lomen
	D2-217			Emails (Dec 2021) between Abdiaziz Farah, Bianca Scott, Afrique Operations, Mukhtar Sharif, Others
	D2-218			Emails (Feb 2022) between Abdirizak Diis, Kara Lomen
	D2-219			Emails (Feb 2022) between Al-AminMasjid Samaha Islamic Center, Kara Lomen
	D2-220			Box - Monthly Claim Packet - Dar Al Farooq - Sep 21
	D2-221			Box - Monthly Claim Packet - Heaven Childcare - Nov 20
	D2-222			Box - Monthly Claim Packet - Heaven Childcare - Mar 21
	D2-223			Box - Monthly Claim Packet - Madina Grocery & Restaurant - Apr 21
	D2-224			Box - Monthly Claim Packet - Heaven Childcare (w Monitoring)
	D2-225			Box - Monthly Claim Packet - Cliff Fen Park
	D2-226			FOF - Monthly Claim Packet
	D2-227			Partners CACFP Training and Site Form Opening Instructions
	D2-228			Box - Monthly Claim Packet - Dakota Learning Center
	D2-229			Box - Monthly Claim Packet - Star Learning Center
	D2-230			Email from Abdiaziz Farah (Aug 2021) with July 2021 Empire Summer Food July Claim (and Supporting Documents)
	D2-231			Restaurant Depot - Empire Purchase Log
	D2-232			Email from Mahad Ibrahim (Jul 2021) - Ali Diriye, Abdulahi Osman, Abdiaziz Farah, Mukhtar Sharif - Re-Warehouse operation

	D2-233				Owatonna Public Schools Letter of Support of Partnership
	D2-234				Photograph of Pallets of Food (at Plymouth Academy, Frances Davis
	D2-235				Photograph of Food Packing and Distribution Operations (231 Photos)
	D2-236				Videos of Food Packing and Distribution Operations (154 Videos)
	D2-237				13825 Edgewood Avenue Savage MN PA, Closing Documents, Payoff
	D2-238				MZ Market LLC Certificate of Good Standing MN Office of Secretary of State
	D2-239				MZ Market LLC MN Secretary of State Articles of Incorporation Original Filing
	D2-240				Empire Gas & Grocery MN Secretary of State Articles of Incorporation

